

**To:** Minnie Grant (minnieg@utetribes.com)[minnieg@utetribes.com]  
**From:** Beeler, Cindy  
**Sent:** Sat 9/17/2016 7:04:16 PM  
**Subject:** Talking Points for Your NTAA Talk

Minnie –

As promised, here are some talking points for your upcoming presentation to the National Tribal Air Association pertaining to air quality in the Uinta Basin and what you and your Air Team are doing about it.

### Background

- The Uinta Basin is home to extensive oil & gas production activities – more than 11,000 wells. About 75% the production is on Indian country on the Uintah & Ouray Indian Reservation and spans ~6800 square miles.
- During winter snow cover and temperature inversions, ozone levels have gone as high as 134 parts per billion. The National Ambient Air Quality standard to protect human health is 70 ppb.
- The nitrogen oxides (NOx) and volatile organic compounds (VOC) that are precursors to ozone, are directly attributed to the oil & gas activities.
- Along with the VOC emissions from oil & gas activities come methane emissions, a potent greenhouse gas with a global warming potential 25 times that of CO2. And a subset of the VOC emissions are toxic air pollutants like benzene, toluene, ethylbenzene and xylene which can cause cancer.

### Ute Tribe Air Program Efforts Underway

- We have been a part of extensive air emission measurement research in the Uinta Basin over the past four years including two wintertime measurement campaigns in 2012 and 2013. Academics and scientists from NOAA and other organizations implemented this research.

- We have supported EPA Region 8's efforts in drafting a Federal Implementation Plan (FIP) to require VOC emission reductions from the existing oil & gas sources that pre-date the federal NSPS OOOO rules and will create a level playing field with Utah's requirements. The FIP is currently under review at OMB. Region 8 used Tribal Minor Source Registration data submitted by the operators to do a robust, detailed cost benefit analysis for the proposed FIP.

- We have worked together with our other stakeholders (EPA, Utah, BLM and operators) to create the first detailed, site-specific emission inventory for oil & gas in the Uinta Basin.

- Region 8 is doing a detailed analysis comparing data submitted by the operators in (1) the Tribal Minor Source Registrations, (2) the recent emission inventory, and (3) EPA's Greenhouse Gas Reporting Program, subpart W.

- We are also working with EPA Region 8, BLM and Utah on two other projects in Uinta Basin to learn more about oil & gas emissions:

1. Bottom-up emission measurements of pneumatic controllers, the #1 methane emission source and #2 VOC emission source. This work will also inform method development for measurements. We participated in the planning of this work and in outreach meetings with the operators to gain site access and keep them informed. The first of a handful of measurement campaigns begins the week of 9/19/16.

2. Top-down Aerial InfraRed (IR) camera survey of the oil & gas facilities in the Basin to look for the "super-emitters". We are in conversations now to discuss the potential of this project. Environmental Defense Fund recently flew over seven oil & gas Basins in the U.S. including the Uinta Basin. They observed hydrocarbon emissions (methane and VOCs) at 6.6% of the facilities flown over in our Basin. We'd like to look into cooperation from operators to fix the emission sources found in this proposed project due to malfunctions.

Hope this is what you were looking for, Minnie. Let me know!

Good luck with your presentation.

**Cindy Beeler**

US EPA Region 8, Energy Advisor

Office of the Regional Administrator

Tel: 303-312-6204

[Beeler.Cindy@epa.gov](mailto:Beeler.Cindy@epa.gov)

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